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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

MARK WILSON

Case No. 6:21-cv-01606-SI

Plaintiffs,

v.

JERRY PLANTE, and JOHN DOES 1-10.

Defendants.

DECLARATION OF  
JASON THOMPSON

I, Jason E. Thompson, hereby declare and state as follows:

1. I am 18 years of age or older and am otherwise competent to make this declaration. I make this declaration on personal knowledge of the matters stated in this declaration or from sources deemed reliable.
2. I am a licensed and active attorney in Oregon (OSB No. 014301).
3. I represented Mark J. Wilson, the plaintiff in this proceeding, with his legal matters in 2020.

4. I have been informed that during the time I represented Mark J. Wilson, Oregon Department of Corrections Special Investigator, Jerry Plante, reviewed emails with attached legal documents to me from Mark J. Wilson that were sent by former Oregon State Correctional Institution (OSCI) Legal Librarian, Pam McKinney.
5. In addition to the protected communications between my client and myself, I have received legal documents pertaining to other Adults In Custody (AIC) at OSCI who Mark J. Wilson was assisting in his capacity as a legal assistant.
6. It was my understanding that my communications with my client by email were being sent to me voluntarily by Pam McKinney and with the understanding that those communications and the legal documents attached to those emails would not be read by the Oregon Department of Corrections officials.
7. I was never informed by Pam McKinney or any other ODOC official that communicating with my client in his case or in the cases he was assisting other AICs would be or have been disclosed or subject to disclosure by Oregon Department of Corrections officials.
8. It was the normal practice for Pam McKinney to provide various ways to communicate (i.e., email or telephone) with Mark J. Wilson.

**I declare under penalty of perjury and under the laws of the United States, pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, memory, and belief.**

EXECUTED on this 2<sup>nd</sup> December.

/s/ Jason E. Thompson  
Jason E. Thompson  
Declarant